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ATTORNEYS FOR DEFENDANTS

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DISTRICT**

**DAVID HOUGH;
MOULOUAD HOCINE;
JENNIFER LEHMKUHL HILL;
AMUND THOMPSON;
PAUL PANICO**

Plaintiffs,

V.

**RYAN CARROLL; MAX K. DAY;
MAX O. DAY; MICHAEL DAY;
YAX ECOMMERCE LLC; PRECISION
TRADING GROUP, LLC;
WA DISTRIBUTION LLC;
PROVIDENCE OAK PROPERTIES, LLC;
WA AMAZON SELLER LLC;
MKD INVESTMENT ADVISOR, LLC;
MKD FAMILY BENEFICIARY, LLC;
MKD FAMILY PRIVATE MANAGEMENT
COMPANY, LLC;
MAX DAY CONSULTING, LLC;
HOUTEX FARM EQUITY PARTNERS
LLC; BUSINESS FINANCIAL SOLUTIONS
ADVISORY LLC; EVO MAXX LLC;
YAX IP AND MANAGEMENT INC. (D.B.A.
“FULFILLABLE”); WWKB LLC;
DREAMS TO REALITY LLC;**

Defendants.

Case No.: 2:24-cv-02886

Assigned for all purposes to:
JUDGE WESLEY L. HSU

DEFENDANTS RYAN CARROLL; MAX K. DAY; MAX O. DAY; MICHAEL DAY; YAX ECOMMERCE LLC; PRECISION TRADING GROUP, LLC; WA DISTRIBUTION LLC'S UNOPPOSED REQUEST FOR REMOTE APPEARANCE

Action Filed: April 9, 2024
Trial Date: N/A

1 COME NOW JURISDICTIONAL DEFENDANTS RYAN CARROLL; MAX K.
2 DAY; MAX O. DAY; MICHAEL DAY; YAX ECOMMERCE LLC; PRECISION
3 TRADING GROUP, LLC; and WA DISTRIBUTION LLC (“Defendants”), and hereby files
4 *Defendants’ Unopposed Request for Remote Appearance* (“Request”) and respectfully shows the
5 Court as follows:
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7 **I. INTRODUCTION**

8 1. On April 9, 2024, Plaintiffs filed their Complaint and Ex Parte Application for a
9 Temporary Restraining Order (“TRO”).
10 2. On April 11, 2024, Defendants filed their Opposition to Plaintiffs’ TRO.
11 3. On April 12, 2024, the Court issued its Standing Order, mandating service upon the
12 Defendants by the Plaintiffs. However, such service was not effectuated.
13 4. On April 15, 2024, the Court granted Plaintiffs’ TRO. It was further ordered that
14 Jurisdictional Defendants appear before the Court on April 19, 2024, at 11:00 AM PT.
15 5. Good cause exists for the granting of this Request as the Jurisdictional Defendants’ primary
16 counsel does not reside locally and is unable to appear at the hearing in-person due to scheduling
17 conflicts with other matters.
18 6. Defendants respectfully requests that the Court allow Defendants to appear remotely at the
19 Preliminary Injunction hearing scheduled for April 29, 2024, at 3:00 PM PT.
20 7. The request is not made for the purpose of delay, but rather, to proceed with the hearing as
21 ordered and afford the Jurisdictional Defendants their counsel of choice for this hearing.
22 8. Counsel for Plaintiff has indicated they do not oppose the relief requested herein.
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II. CONCLUSION

9. Based on the foregoing and for good cause shown, Defendants respectfully requests that this Court grant Defendants' Unopposed Request for Remote Appearance and for such other and further relief to which Defendants may show itself to be justly entitled.

Dated: April 24, 2024.

Respectfully submitted,

By: /s/ Rachel M. Crockett

Rachel M. Crockett

CERTIFICATE OF COMPLIANCE

The undersigned, counsel of record for Defendants, certifies that this Request for Remote Appearance contains 294 words, which complies with the word limit of L.R. 11-6.1

/s/ Rachel M. Crocket
Rachel Crockett

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document, and any attachments, will be served to counsel of record, in accordance with the governing rules of procedure regarding service in this court on this *April 24, 2024*, via email as follows:

/s/ Rachel Crockett
Rachel Crockett